



## COUNTY OF SISKIYOU

## **Board of Supervisors**

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September 14, 1999

CALFED Bay-Delta Program Attn: Rick Breitenbach 1416 Ninth Street, Suite 1155 Sacramento, CA 95814

Subject: Draft Programmatic EIS/EIR, June 1999

Dear Sir:

Thank you for the opportunity to comment.

Overall the tone of this Draft suggests that the decision to implement this program has already been made even though the Draft fails to address the critical water issues and to provide adequate support and assurance that the CALFED Program can accomplish its objectives. This EIS/EIR must show with an adequate level of certainty that there will be adequate quantities of water available to send southward for increasing rates of urban use by increasing populations, to put into the Delta system to restore the functions of the Delta, to provide for appropriate agricultural use, to protect existing water rights and our system of water rights law, to protect area of origin existing and future beneficial uses including Endangered Species Act listed species and Tribal Trust responsibilities, and to protect third parties in any water transfer program all within the context of climatic variability. This Draft lacks the completeness necessary to make a decision on a feasible programmatic alternative. Reasonable estimates of water quantities needed for a solution must add up. There is a lot of process discussion but too little discussion of numerical objectives.

Potentially significant adverse impacts, including unavoidable impacts, potential adverse impacts from program-induced growth, the irreversible and irretrievable commitments of resources, and the potentially significant adverse cumulative impacts associated with the Preferred Program Alternative show that more specific, detailed work needs to be done at the Draft level to develop a more complete set of feasible alternatives to resolve the issues involved.

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The Siskiyou County Board of Supervisors believes additional information, analysis, and assessment is required to arrive at a adequate Draft Programmatic EIS/EIR. Even though this CALFED process is adequate, it must result in an informed and reasonable decision that is capable of being implemented and is capable of resolving the issues.

Sincerely,

LáVada Erickson

Chair, Board of Supervisors

JWD/lrf

cc. Senator Dianne Feinstein Senator Barbara Boxer Congressman Wally Herger

Regional Council of Rural Counties